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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$104,994 IN UNITED  
STATES CURRENCY,

Defendant.

No. 08-08-02331 JL

**STIPULATION FOR AN ADDITIONAL  
STAY PROCEEDING PURSUANT TO 18  
U.S.C. § 981(g) and [PROPOSED] ORDER**

IT IS HEREBY STIPULATED by and between plaintiff United States of America and claimant Todd Dunphy, through undersigned counsel, that this action be stayed pursuant to 18 U.S.C. § 981(g) and 21 U.S.C. § 881(i).

Claimant Todd Dunphy is currently the subject of a related criminal investigation in Hawaii. The allegations in the forfeiture complaint are based, in large part, on the allegations at issue in the related criminal investigation. Both parties have talked to the U.S. Attorney's Office in Hawaii, and understand that the related criminal case will be indicted in the next 60 days. Consequently, the parties agree that a stay in the forfeiture proceeding for 60 days is appropriate in order for the parties to evaluate

1 the issues to be raised in the pending indictment and to determine how that criminal proceeding will affect  
2 the present case.

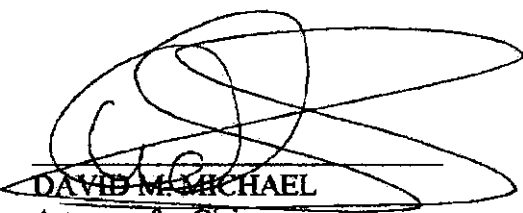
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4 IT IS SO STIPULATED:

JOSEPH P. RUSSONIELLO  
United States Attorney

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7 Dated: August 6, 2009

  
DAVID COUNTRYMAN  
Assistant United States Attorney

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11 Dated: August 6, 2009

  
DAVID M. MICHAEL  
Attorney for Claimant  
Todd Dunphy.

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15 **ORDER GRANTING STAY**

16 UPON CONSIDERATION of the Stipulation to Stay, the entire record, and for good  
17 cause shown, it is by the Court on this 7th day of August, 2009

18 ORDERED that the instant case be, and hereby is, STAYED, until October 21,  
19 2009, at 10:30 a.m. pursuant to 18 U.S.C. § 981(g).

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22 HONORABLE JAMES LARSON  
23 United States Magistrate Judge  
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